

**47 C.F.R. § 64.2009(e) ACCOMPANYING STATEMENT:
POLICIES AND OPERATING PROCEDURES USED TO ENSURE COMPLIANCE
WITH FCC RULES CONCERNING CPNI**

1. GS Texas Ventures, LLC ("GSTX"), as a matter of policy, does not make available to any third party Customer Proprietary Network Information ("CPNI") except as necessary to provide service and comply with applicable interconnection agreements, intercarrier requirements, and as routinely disclosed at the signaling layer.
2. Since CPNI is not made available to third parties, except as necessary to provide service, GSTX is not required to allow the Customer to opt out of the use of their CPNI by third parties. Any changes to this policy will require the adoption of a notice and opt-out mechanism, and status reporting that complies with FCC rules.
3. CPNI is used by GSTX internally as needed for the provisioning, billing, and maintenance of the services provided. CPNI is also used internally for directed sales efforts for service offerings among the categories of service to which the customer already subscribes (e.g. contract renewals), but this information is only provided to GSTX sales staff on a case by case basis and records are maintained of these efforts. GSTX's sales staff do not have access to systems where CPNI is stored and maintained. CPNI is not currently used for general sales and marketing campaigns. Any changes to this policy will require proper record keeping as required by FCC rules.
4. All GSTX staff have been informed that CPNI may only be used for allowed purposes (as narrowly defined herein) and are aware that the unauthorized use of CPNI will be grounds for dismissal.
5. CPNI is protected from unauthorized access and use. Systems that are used to store and maintain CPNI are firewalled from the public internet. Only information associated with individual login sessions is stored on workstations and all data repositories are centralized on servers. Data is segregated at the server level (e.g., staff that do not have access to CPNI do not have accounts on servers where CPNI is stored). Backups are encrypted with password protection. Login credentials are controlled and are changed periodically. Hardcopy is not produced except in a directed manner (e.g. for a particular customer for an authorized use). Hardcopy produced for temporary use (e.g., installation and maintenance activities) is destroyed after use.
6. Supervisory review at the highest level exists to ensure the foregoing policies and procedures are followed.
7. GSTX does not use, disclose or permit access to CPNI to identify or track customers that call competing service providers.